

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: NICHOLAS and KATHLEEN MERLINO, Debtors,	Bankruptcy No. 13-20234-elf Chapter 13 Doc. No.
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**MOTION TO RESTRICT ACCESS AND AUTHORIZE FILING OF REPLACEMENT
PROOF OF CLAIM**

Pursuant to sections 105(a) and 107(c) of title 11 of the United States code (the "Bankruptcy Code"), rule 9037 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), GREEN TREE SERVICING LLC ("Movant"), by and through its undersigned counsel, hereby moves this Court, for entry of an order (the "Order"), substantially in the form attached hereto as Exhibit A (i) directing the Clerk of the Court to restrict remote electronic access to the Filings (as defined below) to protect certain personally identifiable information ("PII") contained therein, and (ii) authorizing Movant to make a Replacement Filing (as defined below). In support of this motion (the "Motion"), Movant respectfully states as follows:

1. A Proof of Claim was filed in the above-captioned case on July 21, 2014 as Claim #14-1, which contains one or more of the identifiers enumerated in Fed. R. Bankr. P. 9037.
2. Movant also requests authority to file the Replacement filing, in the form attached hereto. The Replacement filing is substantively identical to the Filing in all respects, except for the removal of any imperfectly redacted PII. As set forth above, Movant has taken steps to ensure the Replacement filing complies with Bankruptcy Rule 9037(a).

3. Movant further requests that the Replacement filing be deemed to have been filed, for all purposes, on the date the respective Filing was originally filed to ensure that Movant is not prejudiced in any manner.

WHEREFORE, Movant respectfully requests that the Court enter an Order (i) directing the clerk of the Court to permanently restrict remote electronic access to the Filing, (ii) authorizing the filing of the Replacement filing, and (iii) granting such other and further relief as the Court deems appropriate.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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